

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Criminal Case No. 07-20327

vs.

HONORABLE JULIAN ABELE COOK, JR.

D-1 ROY M. BAILEY,
D-2 ANTONIO IVEZAJ,
D-3 TALAL KHALIL CHAHINE,
D-4 MOHAMAD ARZOUNI,
D-5 MOHAMMAD BAZZI.

MAGISTRATE JUDGE MONA MAJZOUB

Defendants.

**JOINT MOTION FOR THE ENTRY OF AN ORDER SETTING STATUS
CONFERENCE AND DETERMINING EXCLUDABLE DELAY**

The parties herein, through their attorneys of record, present this joint motion for the entry of an Order setting the next status conference in this matter for April 1, 2008 and determining excludable delay in this matter. In support of this motion, the parties submit the following:

1. This case involves charges of bribery, extortion and conspiracy to defraud the United States in matters relating to the operations of the U.S. Immigration and Naturalization Service/U.S. Immigration and Customs Enforcement. There are extensive discovery materials in this case which include well over 5,000 pages of documents, including law enforcement reports, transcripts, financial records and telephone records. There are also more than 20 boxes of

materials obtained during the execution of multiple search warrants. Discovery materials also include audio and video recordings, as well as official immigration files for over 50 individuals.

2. Over the past four months, counsel for the United States and counsel for each of the defendants who have been arraigned in this matter have met regularly to attempt to streamline the production and inspection of discovery materials.

3. On February 11, 2008, the parties appeared by telephone for a status conference with the Court. At that time, counsel for each of the defendants requested that a subsequent status conference be scheduled with the Court on April 1, 2008 for the purpose of setting dates for the filing of motions as well as a plea cut off date.

4. Counsel for each defendant requests adequate time to determine if the pending case can be resolved through a plea, thereby saving the expenditure of unnecessary judicial resources, and to otherwise adequately prepare for trial in this matter.

5. The undersigned counsel further submit that failure to allow this extension of time may result in a miscarriage of justice. As such, the parties agree that the time period between October 2, 2006 up to and including April 1, 2008 shall constitute excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), in that the ends of justice served by this delay outweigh the best interest of the public and the defendants in a speedy trial.

WHEREFORE, the parties request that the Court accept this Stipulation and issue the accompanying proposed Order.

Respectfully submitted,

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Dated: February 21, 2008